

## EXHIBIT A



**FREMONT  
BANK**

*Success through Partnership*

**Corporate Headquarters**  
39150 Fremont Boulevard  
Fremont, CA 94538  
TEL (510) 792-2300

[www.fremontbank.com](http://www.fremontbank.com)

May 11, 2022

Vahe S Tashjian  
Vahe S Tashjian 2018 Living Trust  
901 Loyola Dr  
Los Altos, CA 94024

Dear Customer,

Fremont Bank has been served a Subpoena from Fox Rothschild LLP requesting information relating to your account(s). This request requires us to produce certain information or records relating to you as shown on the enclosed copy.

We are informing you of this demand in accordance with our policy of notifying our customers when legal process or similar formal demands are made for information about their accounts or their relationships with us.

While we try to protect the privacy of all of our customers, we must comply with valid legal demands for information made upon us. To protect your rights, you may wish to discuss this matter with your legal counsel.

Sincerely,

Legal Process & Research

Enclosure

Cc: file



**FDIC**



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Fremont, CA 94538  
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May 11, 2022

Jordan Tashjian  
Vahe S Tashjian  
901 Loyola Dr  
Los Altos, CA 94024

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May 11, 2022

Alex Tashjian  
Vahe S Tashjian  
901 Loyola Dr  
Los Altos, CA 94024

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www.fremontbank.com

May 11, 2022

Tahlia Tashjian  
Vahe S Tashjian  
901 Loyola Dr  
Los Altos, CA 94024

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Sincerely,

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FDIC



RECEIVED #22-0377

By RC FREMONT BANK at 4:10 pm, May 06, 2022

received 5/6/22 2:18pm J Vargal

B2570 (Form 2570 - Subpoena to Produce Documents, Information, or Objects or To Permit Inspection in a Bankruptcy Case or Adversary Proceeding) (12/15)

UNITED STATES BANKRUPTCY COURT

Northern

District of California

In re Dutchints Development LLC

Debtor

(Complete if issued in an adversary proceeding)

Case No 21-51255-MEH

Chapter 7

COPY

Plaintiff

v

Adv Proc. No.

Defendant

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)

Fremont Bank, c/o Registered Agent Andrew Mastorakis

To: 37611 Niles Boulevard, Fremont, CA 94536

(Name of person to whom the subpoena is directed)

☒ **Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material See Exhibit A to "Order Authorizing 2004 Examination of Various Entities" attached hereto.

PLACE Fox Rothschild LLP

345 California Street, Suite 2200, San Francisco, CA 94104

DATE AND TIME

June 7, 2022 9:00 a.m.

☐ **Inspection of Premises** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

PLACE

DATE AND TIME

The following provisions of Fed. R. Civ P 45, made applicable in bankruptcy cases by Fed. R. Bankr P 9016, are attached - Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: May 4, 2022

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, email address, and telephone number of the attorney representing (name of party) Richard A Marshack, Chapter 7 Trustee, who issues or requests this subpoena, are: Edward J. Tredinnick, Fox Rothschild LLP, 345 California Street, Suite 2200, San Francisco, CA 94104, (415) 248-1577, Email: etredinnick@foxrothschild.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ P 45(a)(4).

**RECEIVED** #22-0377

By RC FREMONT BANK at 4:10 pm, May 06, 2022

Entered on Docket

April 29, 2022

EDWARD J. EMMONS, CLERK  
U.S. BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA



1 MICHAEL A SWEET (SBN 184345)  
msweet@foxrothschild.com

2 JACK PRAETZFI LIS (SBN 267765)  
jpraetzellis@foxrothschild.com

3 EDWARD J TREDINNICK (SBN 84033)  
etredinnick@foxrothschild.com

4 **FOX ROTHSCHILD LLP**  
345 California Street, Suite 2200  
5 San Francisco, California 94104  
Telephone (415) 364-5540  
6 Facsimile (415) 391-4436

7 Attorneys for Kari Bowyer,  
Interim Chapter 7 Trustee

The following constitutes the order of the Court.  
Signed April 29, 2022

*M. Elaine Hammond*

M Elaine Hammond  
U.S. Bankruptcy Judge

9 UNITED STATES BANKRUPTCY COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN JOSE DIVISION

12 In re

Case No 21-51255-MEH

13 DUTCHINTS DEVELOPMENT LLC,

Chapter 7

14 Debtor

**ORDER AUTHORIZING RULE 2004  
EXAMINATION OF VARIOUS ENTITIES**

[NO HEARING REQUIRED]

17  
18 Upon the application of Kari Bowyer, Trustee of the Estate of Dutchints Development LLC,  
19 ("**Debtor**") pursuant to Bankruptcy Rule 2004 for an examination of various entities and good cause  
20 appearing therefor, IT IS HEREBY ORDERED as follows

21 1 The Trustee may serve upon Wells Fargo Bank, First Republic Bank, Citibank, Fremont Bank  
22 and Heritage Bank subpoenas for the production of documents and electronically stored  
23 information specified in Exhibit A attached hereto

24 2 The Trustee may serve upon Macias Gini & O'Connell, LLP, accountants of the Debtor  
25 subpoenas for the production of documents and electronically stored information the  
26 documents listed in Exhibit B attached hereto.



**RECEIVED** #22-0377

By RC FREMONT BANK at 4:10 pm, May 06, 2022

**EXHIBIT A**

**DOCUMENTS TO BE PRODUCED BY:**

**Wells Fargo Bank, First Republic Bank, CitiBank, Fremont Bank, Heritage Bank**

**DEFINITIONS**

A The term ACCOUNTS shall mean all accounts in the name of the DEBTOR or any DEBTOR-AFFILIATES The presently known account numbers for the DEBTORS and DEBTOR-AFFILIATES follows below The list below shall not be treated as an exclusive list of accounts in the name of the DEBTOR and DEBTOR AFFILIATES

- a Wells Fargo Bank x1058, x5551
- b First Republic Bank x6637, x5001, x6912
- c CitiBank, unknown
- d Fremont Bank x0679
- e. Heritage Bank, unknown

B The term DEBTOR shall mean Dutchints Development LLC.

C The term DEBTOR AFFILIATES shall mean the following persons or entities

- i T Properties LLC
- ii 18500 Marshall Ln LLC
- iii 24925 Oneonta Drive LLC
- iv 1575 Grant Rd LLC
- v 26088 Duval LLC
- vi 570 S Rengstorff Group LLC
- vii San Carlos Group LLC
- viii 1st Street Group LLC
- ix. Flip Fund LLC
- x 18771 Homestead Rd LLC
- xi Warburton Group LLC
- xii 1900 Warburton Ave
- xiii Fund 2 LLC



**RECEIVED** #22-0377

By RC FREMONT BANK at 4:10 pm, May 06, 2022

- 1 xiv 980 Golden Way LLC
- 2 xv 5150 ECR Group
- 3 xvi Vera Ave RC LLC
- 4 xvii ADL 2 LLC
- 5 xviii 1st street Group LLC
- 6 xix 1210 Fremont Ave LLC
- 7 xx 5150 ECR Group LLC
- 8 xxi Urban Catalyst Operating
- 9 xxii Stonebrook Drive LLC
- 10 xxiii San Carlos Ave
- 11 xxiv Vahe Tashjian
- 12 xxv Vahe S Tashjian 2018 Living Trust Dated December 19, 2018
- 13 xxvi Kaela Arnett

**CATEGORIES FOR PRODUCTION**

- 15 1 All signature cards for the ACCOUNTS
- 16 2 All agreements, applications, or other customer-related documents for the
- 17 ACCOUNTS.
- 18 3 Copies of all bank statements for the ACCOUNTS
- 19 4 Copies of the front and back of all checks written on the ACCOUNTS
- 20 5 Copies of the front and back of all checks cashed to the ACCOUNTS.
- 21 6 All information concerning any debit or credit to the ACCOUNTS
- 22 7 All documents, including electronically stored information, evidencing all debts or
- 23 credits to the ACCOUNTS
- 24 8 All wire information for all wires received into the ACCOUNTS, including but not
- 25 limited to the source of the wire and wire transfer confirmations and authorizations.
- 26 9 All wire information for all wires sent from the ACCOUNTS, including but not
- 27 limited to the destination of the wire and wire transfer confirmations and
- 28 authorizations

**RECEIVED** #22-0377

By RC FREMONT BANK at 4:10 pm, May 06, 2022

1 10 All communication with the DEBTOR or any DEBTOR-AFFILIATES  
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